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Abilheira & Associates, P.C.

March 6, 2025

Honorable Naomi Reice Buchwald, U.S.D.J.
United States District Court, Southern District
500 Pearl Street
New York, New York 10007-1312

Re: Carlos Paulino vs. Rory Coyte and CSX Transportation, Inc.
Case No.: 1:22-cv-4091-NRB-JEW
Our File No.: CSX-0198-DN

Dear Judge Buchwald:

This office represents the defendants with respect to the above-captioned matter. In accordance with the Court's instructions of February 6, 2025, the parties jointly submit the proposed Schedule for the completion of all discovery:

- 1) Responses to all outstanding written discovery demands to be served by March 31, 2025.
- 2) Defendants to notice the defense medical examination(s) of Plaintiff by April 15, 2025.
- 3) All non-party and party fact witnesses' depositions to be completed by April 15, 2025.
- 4) Plaintiff's expert disclosure to be provided by May 30, 2025.
- 5) Defendants to conduct the defense medical examination(s) of Plaintiff by May 30, 2025.
- 6) Defendants' expert disclosure to be provided by June 30, 2025.

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7) Expert depositions and discovery to be completed by July 31, 2025.

The parties have reviewed and agreed to the dates set forth herein but request that the Court set a Status Conference in late April to address any outstanding discovery issues.

Respectfully submitted,

Elias Abilheira

ELIAS ABILHEIRA

Counsel for Defendants

Coyte and CSX Transportation, Inc.

EA:mb

cc: David Bonilla, Esq. / Elefterakis, Elefterakis & Panek

Via ECF